

Am, 8, Feb, 04  
ROBINSON, McFADDEN & MOORE, P.C. 169071



ATTORNEYS AND COUNSELORS  
AT LAW

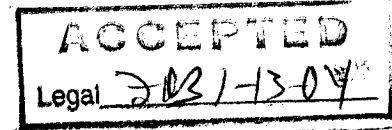
DAVID W. ROBINSON, II  
JOHN S. TAYLOR, JR.  
DANIEL T. BRAILSFORD  
FRANK R. ELLERBE, III  
THOMAS W. BUNCH, II  
J. KERSHAW SPONG  
D. CLAY ROBINSON  
R. WILLIAM METZGER, JR.\*\*  
KEVIN K. BELL  
ANNEMARIE B. MATHEWS †  
BONNIE D. SHEALY  
CHARLES H. McDONALD  
MARGARET R. SCOOPMIRE  
ERIN A. COOK  
M. KEVIN GARRISON  
L. JEFFERSON DAVIS, IV

\*\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law  
† Also Admitted in North Carolina

DAVID W. ROBINSON  
(1869-1935)  
DAVID W. ROBINSON, JR.  
(1899-1989)  
J. MEANS McFADDEN  
(1901-1990)  
THOMAS T. MOORE  
RETIRED  
JAMES M. BRAILSFORD, III  
RETIRED



January 12, 2004



HAND DELIVERED

Mr. Bruce Duke  
Executive Deputy Director  
Public Service Commission of South Carolina  
Synergy Business Park, Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210



Re: Proceeding to Establish Guidelines for an Intrastate  
Universal Service Fund  
Docket No. 97-239-C

Dear Mr. Duke:

Enclosed for filing please find South Carolina Cable Television Association's Interrogatories to Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., and PBT Telecom and Certificates of Service. Please date-stamp the extra copies provided as proof of filing and return them with our courier.

If you have any questions, please have someone on your staff contact me.

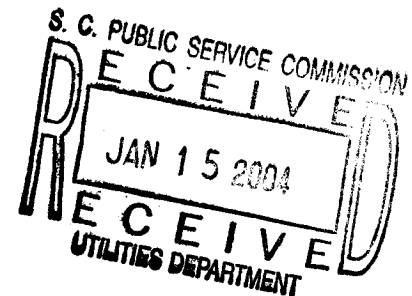
Very truly yours,

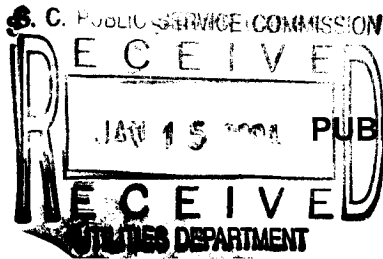
ROBINSON, McFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

/tch  
Enclosures

cc/enc: M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
Ms. Nancy Horne  
parties of record





BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

DOCKET NO. 97-239-C

In Re:

Proceeding to Establish Guidelines for an  
Intrastate Universal Service Fund

) Interrogatories  
) to Bluffton Telephone  
) Company, Inc., Hargray  
) Telephone Company, Inc.,  
) Home Telephone Company,  
) Inc., Horry Telephone  
) Cooperative, Inc., and PBT  
) Telecom

TO: JOHN M. BOWEN, JR., ESQUIRE AND MARGARET M. FOX, ESQUIRE,  
attorneys for Bluffton Telephone Company, Inc., Hargray Telephone  
Company, Inc., Home Telephone Company, Inc., Horry Telephone  
Cooperative, Inc., and PBT Telecom:

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. §  
103-851, and other applicable rules of practice and procedure of the Public  
Service Commission of South Carolina, the South Carolina Cable Television  
Association requests that Bluffton Telephone Company, Inc., Hargray Telephone  
Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative,  
and PBT Telecom, Inc. respond to the following written interrogatories within ten  
(10) days after service. We request that each of the companies to which these  
interrogatories are addressed answer the following interrogatories as applicable.

**Interrogatory No. 1:** For each service for which you have reduced a  
rate and received USF funding since inception of the South Carolina USF, state  
the following:

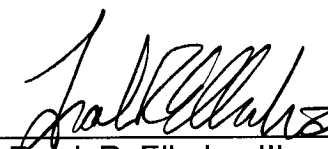
- a) the minutes of use of such service for each year since 1997;  
and,
- b) the revenues received from the sale of such service for each  
year since 1997.

**Interrogatory No. 2:** For each company which has filed updated embedded cost studies in support of its application for additional USF funding provide the following information:

- a) the total amount of additional capital investment you have made since 1997;
- b) expenditures for each year since 1997, by USOA account, which were made to upgrade the network of the company;
- c) whether the company or any of its affiliates provide broadband services; and,
- d) whether the company or any of its affiliates provide cable television services or services similar to cable television services such as "digital entertainment services."

ROBINSON, McFADDEN & MOORE, P.C.

By: \_\_\_\_\_



Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

January 12, 2004

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 97-239-C**

In Re:

Proceeding to Establish Guidelines for  
an Intrastate Universal Service Fund


**CERTIFICATE OF SERVICE**

This is to certify that I, Zachari Minton, an employee with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **South Carolina Cable Television Association's Interrogatories to Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., and PBT Telecom** in the foregoing matter by hand delivering a copy of same to the following address:

M. John Bowen, Jr., Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, South Carolina 29201

Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, South Carolina 29201

Dated at Columbia, South Carolina, this 12<sup>th</sup> day of January, 2004.

  
\_\_\_\_\_  
Zachari Minton

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 97-239-C**

In Re:

Proceeding to Establish Guidelines  
for an Intrastate Universal Service  
Fund

**CERTIFICATE OF SERVICE**

This is to certify that I, Angela B. Wedekind , a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association's Interrogatories to Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc. and PBT Telecom and Certificates of Service** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltell South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

John C. Ruoff, Ph.D.  
4322 Azalea Drive  
Columbia, SC 29205

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DeltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A.  
P.O. Drawer 7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

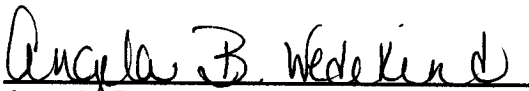
Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

M. John Bowen, Jr., Esquire  
McNair Law Firm, P.A.  
P.O. Box 11390  
Columbia, SC 29211

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 12th day of January 04.

  
Angela B. Wedekind